

**IN THE UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF GEORGIA
ATLANTA DIVISION**

ANGELA ROBINSON,)
vs.)
Plaintiff,)
SPEEDY RECOVERY SERVICES, INC.) Civil Action File No.
and MVCONNECT, LLC a.k.a.) 1:22-cv-02444-LMM-JSA
MVTRAC, LLC,)
Defendants.)

**DEFENDANT SPEEDY RECOVERY SERVICES, INC.'S ANSWER
AND DEFENSES TO PLAINTIFF'S COMPLAINT AND CROSS-CLAIM
AGAINST DEFENDANT MVCONNECT, LLC**

Defendant SPEEDY RECOVERY SERVICES, INC. files its answer and defenses to Plaintiff's Complaint and respectfully shows the Court as follows:

FIRST DEFENSE

Plaintiff may not recover against this Defendant because this Defendant breached no legal duty owed to Plaintiff.

SECOND DEFENSE

Plaintiff may not recover against this Defendant as Plaintiff has failed to prove actual damages.

THIRD DEFENSE

Plaintiff may not recover against this Defendant as Plaintiff has failed to comply with O.C.G.A. §10-1-399.

FOURTH DEFENSE

This Defendant asserts its right of apportionment according to the provisions of O.C.G.A. § 51-12-33(b).

FIFTH DEFENSE

Plaintiff may only recover against this Defendant based on its percentage of fault, if any, according to the provisions of O.C.G.A. § 51-12-31.

SIXTH DEFENSE

While this Defendant denies any and all liability for Plaintiff's punitive damages claim, Defendant asserts all procedural and proof requirements set by O.C.G.A. § 51-12-5.1 or other applicable law relating to this damages claim. This Defendant denies any willful, intentional, malicious, or reckless acts as alleged by Plaintiff.

SEVENTH DEFENSE

To the extent that Plaintiff failed to plead special damages with specificity, those damages are barred.

EIGHTH DEFENSE

Plaintiff's alleged damages, if any, were directly and proximately caused by a party other than this Defendant.

NINTH DEFENSE

Plaintiff Complaint fails to state claim against this Defendant for which relief may be granted as Plaintiff has failed to articulate what, if any, unfair or deceptive acts or practices in the conduct of consumer transactions were performed by this Defendant.

TENTH DEFENSE

Pending discovery and further investigation, this Defendant asserts any and all defenses that may be waivable under FRCP 8(c).

TWELFTH DEFENSE

In further response to Plaintiff's Complaint, this Defendant responds as follows:

1.

To the extent paragraph 1 of Plaintiff's Complaint requires a response, this Defendant states that it denies any wrongdoing and further denies that any action or inaction on behalf of this Defendant was the proximate cause of any damages to Plaintiff.

SUBJECT MATTER JURISDICTION

2.

This Defendant does not object to this Court's jurisdiction over Plaintiff's claims based on federal law and further admits that this Court would have supplemental jurisdiction over the claims based on state law. However, in the event Plaintiff's claims based on federal law are dismissed, this Defendant objects to this Court's jurisdiction over the claims based on state law and urges this Court to exercise its discretion and dismiss said state law claims for lack of jurisdiction.

3.

This Defendant does not object to the venue of the Court so long as Plaintiff's claims based on federal law remain valid.

4.

This Defendant does not object to this Court's jurisdiction over Plaintiff's claims based on federal law and further admits that this Court would have supplemental jurisdiction over the claims based on state law. However, in the event Plaintiff's claims based on federal law are dismissed, this Defendant objects to this Court's jurisdiction over the claims based on state law and urges this Court to exercise its discretion and dismiss said state law claims for lack of jurisdiction.

PARTIES AND PERSONAL JURISDICTION

5.

This Defendant can neither admit nor deny the allegations in Paragraph 5 of Plaintiff's Complaint for lack of sufficient information upon which to form a belief as to the truth of the matters asserted, and therefore, places Plaintiff on strict proof of same.

6.

This Defendant admits the allegations set forth in Paragraph 6 of Plaintiff's Complaint.

7.

This Defendant admits the allegations set forth in Paragraph7 of Plaintiff's Complaint.

8.

This Defendant admits that jurisdiction and venue are proper as to Plaintiff's claims based on federal law. This Defendant admits that this Court has supplemental jurisdiction over the other state court claims. However, this Defendant denies that this Court has jurisdiction over the state court claims absent the federal court claims.

9.

This Defendant admits the allegations set forth in Paragraph 9 of Plaintiff's Complaint.

10.

This Defendant admits the allegations set forth in Paragraph 10 of Plaintiff's Complaint.

11.

This Defendant can neither admit nor deny the allegations in Paragraph 11 of Plaintiff's Complaint for lack of sufficient information upon which to form a belief as to the truth of the matters asserted, and therefore, places Plaintiff on strict proof of same.

12.

This Defendant can neither admit nor deny the allegations in Paragraph 12 of Plaintiff's Complaint for lack of sufficient information upon which to form a belief as to the truth of the matters asserted, and therefore, places Plaintiff on strict proof of same.

13.

This Defendant can neither admit nor deny the allegations in Paragraph 13 of Plaintiff's Complaint for lack of sufficient information upon which to form a

belief as to the truth of the matters asserted, and therefore, places Plaintiff on strict proof of same.

14.

This Defendant can neither admit nor deny the allegations in Paragraph 14 of Plaintiff's Complaint for lack of sufficient information upon which to form a belief as to the truth of the matters asserted, and therefore, places Plaintiff on strict proof of same.

15.

This Defendant can neither admit nor deny the allegations in Paragraph 15 of Plaintiff's Complaint for lack of sufficient information upon which to form a belief as to the truth of the matters asserted, and therefore, places Plaintiff on strict proof of same.

16.

This Defendant can neither admit nor deny the allegations in Paragraph 16 of Plaintiff's Complaint for lack of sufficient information upon which to form a belief as to the truth of the matters asserted, and therefore, places Plaintiff on strict proof of same.

17.

This Defendant can neither admit nor deny the allegations in Paragraph 17 of Plaintiff's Complaint for lack of sufficient information upon which to form a belief as to the truth of the matters asserted, and therefore, places Plaintiff on strict proof of same.

18.

This Defendant can neither admit nor deny the allegations in Paragraph 18 of Plaintiff's Complaint for lack of sufficient information upon which to form a belief as to the truth of the matters asserted, and therefore, places Plaintiff on strict proof of same.

19.

This Defendant can neither admit nor deny the allegations in Paragraph 19 of Plaintiff's Complaint for lack of sufficient information upon which to form a belief as to the truth of the matters asserted, and therefore, places Plaintiff on strict proof of same.

20.

This Defendant can neither admit nor deny the allegations in Paragraph 20 of Plaintiff's Complaint for lack of sufficient information upon which to form a

belief as to the truth of the matters asserted, and therefore, places Plaintiff on strict proof of same.

21.

This Defendant can neither admit nor deny the allegations in Paragraph 21 of Plaintiff's Complaint for lack of sufficient information upon which to form a belief as to the truth of the matters asserted, and therefore, places Plaintiff on strict proof of same.

22.

This Defendant can neither admit nor deny the allegations in Paragraph 22 of Plaintiff's Complaint for lack of sufficient information upon which to form a belief as to the truth of the matters asserted, and therefore, places Plaintiff on strict proof of same.

23.

This Defendant can neither admit nor deny the allegations in Paragraph 23 of Plaintiff's Complaint for lack of sufficient information upon which to form a belief as to the truth of the matters asserted, and therefore, places Plaintiff on strict proof of same.

24.

This Defendant can neither admit nor deny the allegations in Paragraph 24 of Plaintiff's Complaint for lack of sufficient information upon which to form a belief as to the truth of the matters asserted, and therefore, places Plaintiff on strict proof of same.

25.

This Defendant can neither admit nor deny the allegations in Paragraph 25 of Plaintiff's Complaint for lack of sufficient information upon which to form a belief as to the truth of the matters asserted, and therefore, places Plaintiff on strict proof of same.

FACTUAL ALLEGATIONS

26.

This Defendant admits the allegations set forth in Paragraph 26 of Plaintiff's Complaint.

27.

This Defendant admits the allegations set forth in Paragraph 27 of Plaintiff's Complaint.

28.

This Defendant admits the allegations set forth in Paragraph 26 of Plaintiff's Complaint.

29.

This Defendant objects to the allegations in Paragraph 29 of Plaintiff's Complaint as vague and, therefore, denies the allegations set forth in Paragraph 29 of Plaintiff's Complaint.

30.

This Defendant admits that it uses mail in its business. However, this Defendant denies that it utilizes mail for the purposes of collecting any debt nor does it send any mail to any purported debtors.

31.

This Defendant admits it uses phones and other electronic devices in the course of its business. This Defendant denies that it performs services outside the State of Georgia.

32.

This Defendant denies the allegations set forth in Paragraph 32 of Plaintiff's Complaint.

33.

This Defendant denies the allegations set forth in in Paragraph 33 of Plaintiff's Complaint.

34.

This Defendant admits that it contracts with businesses that may be domiciled in other states. However, this Defendant denies that it performs any services outside the State of Georgia.

35.

This Defendant denies the allegations set forth in in Paragraph 35 of Plaintiff's Complaint.

36.

This Defendant can neither admit nor deny the allegations in Paragraph 36 of Plaintiff's Complaint for lack of sufficient information upon which to form a belief as to the truth of the matters asserted, and therefore, places Plaintiff on strict proof of same.

37.

This Defendant can neither admit nor deny the allegations in Paragraph 37 of Plaintiff's Complaint for lack of sufficient information upon which to form a

belief as to the truth of the matters asserted, and therefore, places Plaintiff on strict proof of same.

38.

This Defendant can neither admit nor deny the allegations in Paragraph 38 of Plaintiff's Complaint for lack of sufficient information upon which to form a belief as to the truth of the matters asserted, and therefore, places Plaintiff on strict proof of same.

39.

This Defendant can neither admit nor deny the allegations in Paragraph 39 of Plaintiff's Complaint for lack of sufficient information upon which to form a belief as to the truth of the matters asserted, and therefore, places Plaintiff on strict proof of same.

40.

This Defendant can neither admit nor deny the allegations in Paragraph 40 of Plaintiff's Complaint for lack of sufficient information upon which to form a belief as to the truth of the matters asserted, and therefore, places Plaintiff on strict proof of same.

41.

This Defendant can neither admit nor deny the allegations in Paragraph 41 of Plaintiff's Complaint for lack of sufficient information upon which to form a belief as to the truth of the matters asserted, and therefore, places Plaintiff on strict proof of same.

42.

This Defendant can neither admit nor deny the allegations in Paragraph 42 of Plaintiff's Complaint for lack of sufficient information upon which to form a belief as to the truth of the matters asserted, and therefore, places Plaintiff on strict proof of same.

43.

This Defendant can neither admit nor deny the allegations in Paragraph 43 of Plaintiff's Complaint for lack of sufficient information upon which to form a belief as to the truth of the matters asserted, and therefore, places Plaintiff on strict proof of same.

44.

This Defendant can neither admit nor deny the allegations in Paragraph 44 of Plaintiff's Complaint for lack of sufficient information upon which to form a

belief as to the truth of the matters asserted, and therefore, places Plaintiff on strict proof of same.

45.

This Defendant can neither admit nor deny the allegations in Paragraph 45 of Plaintiff's Complaint for lack of sufficient information upon which to form a belief as to the truth of the matters asserted, and therefore, places Plaintiff on strict proof of same.

46.

This Defendant can neither admit nor deny the allegations in Paragraph 46 of Plaintiff's Complaint for lack of sufficient information upon which to form a belief as to the truth of the matters asserted, and therefore, places Plaintiff on strict proof of same.

47.

This Defendant can neither admit nor deny the allegations in Paragraph 47 of Plaintiff's Complaint for lack of sufficient information upon which to form a belief as to the truth of the matters asserted, and therefore, places Plaintiff on strict proof of same.

48.

This Defendant can neither admit nor deny the allegations in Paragraph 48 of Plaintiff's Complaint for lack of sufficient information upon which to form a belief as to the truth of the matters asserted, and therefore, places Plaintiff on strict proof of same.

49.

This Defendant can neither admit nor deny the allegations in Paragraph 49 of Plaintiff's Complaint for lack of sufficient information upon which to form a belief as to the truth of the matters asserted, and therefore, places Plaintiff on strict proof of same.

50.

This Defendant can neither admit nor deny the allegations in Paragraph 50 of Plaintiff's Complaint for lack of sufficient information upon which to form a belief as to the truth of the matters asserted, and therefore, places Plaintiff on strict proof of same.

51.

This Defendant can neither admit nor deny the allegations in Paragraph 51 of Plaintiff's Complaint for lack of sufficient information upon which to form a

belief as to the truth of the matters asserted, and therefore, places Plaintiff on strict proof of same.

52.

This Defendant can neither admit nor deny the allegations in Paragraph 52 of Plaintiff's Complaint for lack of sufficient information upon which to form a belief as to the truth of the matters asserted, and therefore, places Plaintiff on strict proof of same.

53.

This Defendant can neither admit nor deny the allegations in Paragraph 53 of Plaintiff's Complaint for lack of sufficient information upon which to form a belief as to the truth of the matters asserted, and therefore, places Plaintiff on strict proof of same.

54.

This Defendant can neither admit nor deny the allegations in Paragraph 54 of Plaintiff's Complaint for lack of sufficient information upon which to form a belief as to the truth of the matters asserted, and therefore, places Plaintiff on strict proof of same.

55.

This Defendant can neither admit nor deny the allegations in Paragraph 55 of Plaintiff's Complaint for lack of sufficient information upon which to form a belief as to the truth of the matters asserted, and therefore, places Plaintiff on strict proof of same.

56.

This Defendant can neither admit nor deny the allegations in Paragraph 56 of Plaintiff's Complaint for lack of sufficient information upon which to form a belief as to the truth of the matters asserted, and therefore, places Plaintiff on strict proof of same.

57.

This Defendant can neither admit nor deny the allegations in Paragraph 57 of Plaintiff's Complaint for lack of sufficient information upon which to form a belief as to the truth of the matters asserted, and therefore, places Plaintiff on strict proof of same.

58.

This Defendant can neither admit nor deny the allegations in Paragraph 58 of Plaintiff's Complaint for lack of sufficient information upon which to form a

belief as to the truth of the matters asserted, and therefore, places Plaintiff on strict proof of same.

59.

This Defendant can neither admit nor deny the allegations in Paragraph 59 of Plaintiff's Complaint for lack of sufficient information upon which to form a belief as to the truth of the matters asserted, and therefore, places Plaintiff on strict proof of same.

60.

This Defendant admits the allegations set forth in Paragraph 60 of Plaintiff's Complaint.

61.

This Defendant admits the allegations set forth in Paragraph 61 of Plaintiff's Complaint.

62.

This Defendant admits the allegations set forth in Paragraph 62 of Plaintiff's Complaint.

63.

This Defendant denies the allegations set forth in Paragraph 63 of Plaintiff's Complaint.

64.

This Defendant can neither admit nor deny the allegations in Paragraph 64 of Plaintiff's Complaint for lack of sufficient information upon which to form a belief as to the truth of the matters asserted, and therefore, places Plaintiff on strict proof of same.

65.

This Defendant can neither admit nor deny the allegations in Paragraph 65 of Plaintiff's Complaint for lack of sufficient information upon which to form a belief as to the truth of the matters asserted, and therefore, places Plaintiff on strict proof of same.

66.

This Defendant can neither admit nor deny the allegations in Paragraph 66 of Plaintiff's Complaint for lack of sufficient information upon which to form a belief as to the truth of the matters asserted, and therefore, places Plaintiff on strict proof of same.

67.

This Defendant can neither admit nor deny the allegations in Paragraph 67 of Plaintiff's Complaint for lack of sufficient information upon which to form a

belief as to the truth of the matters asserted, and therefore, places Plaintiff on strict proof of same.

68.

This Defendant can neither admit nor deny the allegations in Paragraph 68 of Plaintiff's Complaint for lack of sufficient information upon which to form a belief as to the truth of the matters asserted, and therefore, places Plaintiff on strict proof of same.

69.

This Defendant can neither admit nor deny the allegations in Paragraph 69 of Plaintiff's Complaint for lack of sufficient information upon which to form a belief as to the truth of the matters asserted, and therefore, places Plaintiff on strict proof of same.

70.

This Defendant denies the allegations set forth in Paragraph 70 of Plaintiff's Complaint.

71.

This Defendant admits it took possession of the MOTOR VEHICLE on or around June 21, 2021. This Defendant lacks sufficient information or knowledge as to whether the vehicle was located close to Plaintiff's home.

72.

This Defendant admits the allegations set forth in Paragraph 72 of Plaintiff's Complaint.

73.

This Defendant can neither admit nor deny the allegations in Paragraph 73 of Plaintiff's Complaint for lack of sufficient information upon which to form a belief as to the truth of the matters asserted, and therefore, places Plaintiff on strict proof of same.

74.

This Defendant can neither admit nor deny the allegations in Paragraph 74 of Plaintiff's Complaint for lack of sufficient information upon which to form a belief as to the truth of the matters asserted, and therefore, places Plaintiff on strict proof of same.

75.

This Defendant can neither admit nor deny the allegations in Paragraph 75 of Plaintiff's Complaint for lack of sufficient information upon which to form a belief as to the truth of the matters asserted, and therefore, places Plaintiff on strict proof of same.

76.

This Defendant can neither admit nor deny the allegations in Paragraph 76 of Plaintiff's Complaint for lack of sufficient information upon which to form a belief as to the truth of the matters asserted, and therefore, places Plaintiff on strict proof of same.

77.

This Defendant denies the allegations set forth in Paragraph 77 of Plaintiff's Complaint.

78.

This Defendant denies the allegations set forth in Paragraph 78 of Plaintiff's Complaint.

79.

This Defendant denies the allegations set forth in Paragraph 79 of Plaintiff's Complaint.

80.

This Defendant can neither admit nor deny the allegations in Paragraph 80 of Plaintiff's Complaint for lack of sufficient information upon which to form a belief as to the truth of the matters asserted, and therefore, places Plaintiff on strict proof of same.

81.

This Defendant can neither admit nor deny the allegations in Paragraph 81 of Plaintiff's Complaint for lack of sufficient information upon which to form a belief as to the truth of the matters asserted, and therefore, places Plaintiff on strict proof of same.

82.

This Defendant can neither admit nor deny the allegations in Paragraph 82 of Plaintiff's Complaint for lack of sufficient information upon which to form a belief as to the truth of the matters asserted, and therefore, places Plaintiff on strict proof of same.

83.

This Defendant denies the allegations set forth in Paragraph 83 of Plaintiff's Complaint.

84.

This Defendant can neither admit nor deny the allegations in Paragraph 84 of Plaintiff's Complaint for lack of sufficient information upon which to form a belief as to the truth of the matters asserted, and therefore, places Plaintiff on strict proof of same.

85.

This Defendant can neither admit nor deny the allegations in Paragraph 85 of Plaintiff's Complaint for lack of sufficient information upon which to form a belief as to the truth of the matters asserted, and therefore, places Plaintiff on strict proof of same. This Defendant denies that Plaintiff is entitled to any recovery against this Defendant.

86.

To the extent the allegations set forth in Paragraph 86 require a response, this Defendant denies that Plaintiff is entitled to any recovery against this Defendant.

87.

This Defendant can neither admit nor deny the allegations in Paragraph 87 of Plaintiff's Complaint for lack of sufficient information upon which to form a belief as to the truth of the matters asserted, and therefore, places Plaintiff on strict proof of same. This Defendant denies that Plaintiff is entitled to any recovery against this Defendant.

88.

This Defendant can neither admit nor deny the allegations in Paragraph 85 of Plaintiff's Complaint for lack of sufficient information upon which to form a

belief as to the truth of the matters asserted, and therefore, places Plaintiff on strict proof of same. This Defendant denies that Plaintiff is entitled to any recovery against this Defendant.

89.

This Defendant denies the allegations set forth in Paragraph 89 of Plaintiff's Complaint.

90.

This Defendant denies the allegations set forth in Paragraph 90 of Plaintiff's Complaint.

91.

This Defendant denies the allegations set forth in Paragraph 91 of Plaintiff's Complaint.

92.

This Defendant denies the allegations set forth in Paragraph 92 of Plaintiff's Complaint.

93.

This Defendant denies the allegations set forth in Paragraph 93 of Plaintiff's Complaint.

94.

This Defendant denies the allegations set forth in Paragraph 94 of Plaintiff's Complaint.

95.

This Defendant denies the allegations set forth in Paragraph 95 of Plaintiff's Complaint.

96.

To the extent the allegations set forth in Paragraph 96 require a response, this Defendant denies that Plaintiff is entitled to any recovery against this Defendant.

97.

This Defendant can neither admit nor deny the allegations in Paragraph 87 of Plaintiff's Complaint for lack of sufficient information upon which to form a belief as to the truth of the matters asserted, and therefore, places Plaintiff on strict proof of same.

CAUSES OF ACTION
COUNT ONE: FAIR DEBT COLLECTION PRACTICES ACT

98.

This Defendant denies the allegations set forth in Paragraph 98 of Plaintiff's Complaint.

99.

This Defendant object to Paragraph 99 as it is not a statement of fact rather a recitation of law. To the extent the allegations set forth in Paragraph 99 require a response, this Defendant denies that Plaintiff is entitled to any recovery against this Defendant.

100.

This Defendant can neither admit nor deny the allegations in Paragraph 100 of Plaintiff's Complaint for lack of sufficient information upon which to form a belief as to the truth of the matters asserted, and therefore, places Plaintiff on strict proof of same. This Defendant denies any wrongdoing and further denies that Plaintiff is entitled to any recovery against this Defendant.

101.

This Defendant denies the allegations set forth in Paragraph 101 of Plaintiff's Complaint.

COUNT TWO: GEORGIA FAIR BUSINESS PRACTICES ACT

102.

This Defendant denies the allegations set forth in Paragraph 102 of Plaintiff's Complaint.

103.

This Defendant denies the allegations set forth in Paragraph 103 of Plaintiff's Complaint.

104.

This Defendant object to Paragraph 104 as it is not a statement of fact rather a recitation of law. To the extent the allegations set forth in Paragraph 99 require a response, this Defendant denies that Plaintiff is entitled to any recovery against this Defendant.

105.

This Defendant denies the allegations set forth in Paragraph 105 of Plaintiff's Complaint.

**COUNT THREE: WRONGFUL REPOSSESSION AND OTHER
TORTS**

106.

This Defendant denies the allegations set forth in Paragraph 106 of Plaintiff's Complaint.

107.

This Defendant denies the allegations set forth in Paragraph 107 of Plaintiff's Complaint.

108.

This Defendant denies the allegations set forth in Paragraph 108 of Plaintiff's Complaint.

COUNT FOUR: NEGLIGENCE

109.

This Defendant denies the allegations set forth in Paragraph 109 of Plaintiff's Complaint.

110.

This Defendant denies the allegations set forth in Paragraph 110 of Plaintiff's Complaint.

This Defendant denies Plaintiff's prayer for relief and denies that Plaintiff is entitled to any recover against this Defendant.

All other allegations in Plaintiff's Complaint not otherwise hereinbefore responded to are denied.

WHEREFORE having fully answered, this Defendant respectfully requests that the instant civil action be inquired into and dismissed with costs assessed against the Plaintiff.

TRIAL BY JURY IS DEMANDED.

DEFENDANT SPEEDY RECOVERY SERVICES, INC.'S CROSS-CLAIM

1.

Defendant Speedy Recovery Services, Inc. is Georgia Corporation authorized to do business in the State of Georgia and competent to bring this cross-claim.

2.

Defendant Speedy Recovery Services, Inc.'s cross-claim arises out of the same common nucleus of operative facts as Plaintiff's claims.

3.

Defendant MVConnect is subject to the jurisdiction of this Court as it contracted Defendant Speedy Recovery Services, Inc. to provide certain repossession services within this Court's venue.

4.

Defendant MVConnect, LLC contracted Defendant Speedy Recovery Services, Inc. to repossess vehicles at Defendant MVConnect, LLC's direction.

5.

Said agreement was memorialized in a Repossession Services Agreement signed by the parties (hereinafter the "Agreement").

6.

Pursuant to Section 9B of the Agreement, Defendant MVConnect agreed to fully protect, indemnify and hold harmless and defend Defendant Speedy Recovery Services, Inc. from any and all loss relating to any activity as a result of the Agreement, caused directly and proximately by any activity of Defendant MVConnect or its affiliate, subsidiary or parent, their respective directors, officers, employees and subcontractors.

7.

To the extent Defendant Speedy Recovery Services, Inc. is held liable or incur any costs arising out of this litigation, it contends that Defendant MVConnect may be directly and proximately responsible.

8.

Defendant Speedy Recovery Services, Inc. is entitled to indemnification by Defendant MVConnect for any and all costs it has incurred and may incur as a result of this litigation, including its reasonable attorney's fees.

WHEREFORE, Defendant Speedy Recovery Services prays as follows:

- (a) In the event of a judgment by Plaintiff, that this Defendant be entitled to judgment in a like amount and manner against Defendant MVConnect, LLC;
- (b) For all fees, expenses, and costs incurred in defense of Plaintiff's claims;
- (c) For its attorney's fees and expenses in this matter;
- (d) For other relief as the Court deems proper

Respectfully submitted this 1st day of August, 2022.

DREW ECKL & FARNHAM, LLP

/s/ Robert A. Quinn

Matthew A. Nanninga
(Georgia Bar No. 159070)
Robert A. Quinn
(Georgia Bar No. 473668)

*Attorneys for Defendant
Speedy Recovery Services, Inc.*

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Atlanta, Georgia 30308

(404) 885-1400

nanningam@deflaw.com

quinnr@deflaw.com

CERTIFICATE OF FONT COMPLIANCE

Counsel for Defendant hereby certifies that the forgoing has been prepared with one of the font and point selections approved by the Court in LR 5.1(C): Times New Roman (14 point).

This 1st day of August, 2022.

s/ Robert A. Quinn

Matthew A. Nanninga
(Georgia Bar No. 159070)
Robert A. Quinn
(Georgia Bar No. 473668)
Attorney for Defendant
Speedy Recovery Services, Inc.

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nanningam@deflaw.com
quinnr@deflaw.com

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that I have this day served a copy of the within and foregoing **Defendant Speedy Recovery Services, Inc.'s Answer and Defenses to Plaintiff's Complaint** upon all parties to this matter by filing with the Court's CM/ECF system, which will automatically e-mail notification of same to the following counsel of record:

James M. Feagle
Cliff R. Dorsen
Chelsea R. Feagle
SKAAR & FEAGLE, LLP
2374 Main Street, Suite B
Tucker, GA 30084

Kris Skaar
Justin T. Holcombe
SKAAR & FEAGLE, LLP
133 Mirramont Lake Drive
Woodstock, GA 30189

This 1st day of August, 2022.

/s/ Robert A. Quinn

Robert A. Quinn
(Georgia Bar No. 473668)
Attorney for Defendant
Speedy Recovery Services, Inc.

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